

Bill Lamb
President
and General Manager
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October 3, 2005

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: CG Docket No. 05-231

Dear Ms. Dortch:

Block Communications, Inc., is the owner of four small to mid-sized market television stations: WDRB in Louisville, Kentucky, WFTE in Salem, Indiana, WLIO in Lima, Ohio, and KTRV in Nampa, Idaho. We write to respond to the FCC's proposal in this docket to modify its closed captioning requirements.

We do not believe that the public interest would be served by imposing real-time closed captioning requirements in our markets, and we are strongly opposed to new requirements for accuracy and penalties for errors. Please allow us to share with you our reasoning.

We have obtained bona fide quotes from vendors and calculated that the cost of providing real-time closed captioning for our station's newscasts would be at least \$151,520 for WDRB and WFTE, \$32,760 for KTRV, and \$77,000 for WLIO each year.

This new mandate would come at a time when we can least afford major new expenses, and our revenues quite simply do not allow it. Specifically, this captioning expense would come directly on the heels of millions of dollars spent to construct new facilities for digital and high definition television. We are not finished with those expenses either. None of the millions of dollars of expenses for DTV construction will bring us one more viewer, one more advertiser, or one more dollar of advertising. The same is true for the looming 100% captioning requirement that becomes effective on January 1st, and the same would be generally true for a new real time captioning rule. Meanwhile, television stations like ours face unprecedented changes in industry and technology that put further pressures on our ability to attract and maintain audiences and advertising support.

While the cost of real time captioning may be recouped to some extent through underwriting in larger markets, few such underwriters exist for Louisville, and no such options exist in smaller markets like Nampa and Lima. Even if we could find an underwriter to finance the annual cost of real time captioning in a market like Lima, we could not justify the expense to the client given the relatively small number of people who would benefit in the 194th-ranked DMA.

Bill Lamb's experience in Peoria, Illinois, DMA 116, is worth noting. For six years, Bill unsuccessfully tried to find underwriting for real-time captioning of the station's local newscasts. He went to Peoria's finest corporate citizens like Caterpillar, State Farm Insurance, Country Companies Insurance, and Mitsubishi. All of them considered the request and crunched the numbers, but none could find a sufficient ROI for this investment because the market is simply too small.

The other key issue we would like to address is the FCC's proposal to regulate accuracy in closed captioning. This proposal is unwise and unworkable. It is akin to the FCC fining us because a newscaster mispronounced the name of a street, or a new meteorologist inadvertently identified the wrong county in a weather report. Our stations – and we believe all broadcast stations – strive every day to reduce and hopefully eliminate mistakes in every aspect of our business. Imposing more government standards that leave no room for human error will not accelerate or assist these efforts.

The process of captioning consists of a court reporter entering what he or she hears into a court recording machine. Normally, a court reporter will then look at his or her code and interpret it exactly as it was spoken when it was transcribed for the court record. With television closed captioning, however, typically a computer translates the court reporter's input into English immediately. It takes time for the computer's dictionary to "learn" the market. For example, when Bill was in Miami, he procured underwriting which allowed WPLG to be the first television station in the market to provide real-time closed captioning. The station hired a local company that knew the city and area. But it had never before captioned television. The station began with high hopes and great intentions, but there were many mistakes in the beginning. The anchor would say "Today in Washington..." and the captioner would input those words, but the computer would display on the screen, "Today in washing some..." After the telecast, the captioner would go back and "teach" the dictionary to interpret those specific key strokes to mean "Washington." Despite considerable effort to correct every anomaly over the next several weeks, it was – and is – simply impossible to teach the computer's dictionary every possible local word, street, and person's name. There will always be a certain number of mistakes in captioning, despite the best of intentions.

We remain committed to providing real time closed captioning to the extent that our markets and budgets permit. After three years of extensive effort to procure underwriting in Louisville, we are proud to announce that WDRB will begin providing this service for our community on October 1, 2005. It is important to note, however, that WDRB is able to launch this service only after finding a willing underwriter.

We therefore believe that the public interest would more appropriately be served by the FCC encouraging or even incentivizing stations to find their own business model to support real time captioning rather than imposing new, costly, unwise, and unworkable obligations.

Thank you for your time and consideration of our response.

Sincerely,



Bill Lamb
President
WDRB-TV/WFTE-TV



Bruce Opperman
President
WLIO-TV



Rick Joseph
President
KTRV-TV